

**CKR LAW LLP**

1330 Avenue of the Americas, 14<sup>th</sup> Floor  
New York, New York 10019  
Telephone: (212) 259-7300  
Facsimile: (212) 259-8200  
Gilbert R. Saydah Jr., Esq.

*Counsel to Bradshaw Westwood Trust*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
In re:	:	Chapter 11
	:	
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:	Case No. 18-23538-rdd
	:	(Jointly Administered)
Debtors.	:	
	:	
-----X	:	

**NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that pursuant to 11 U.S.C. § 1109(b) and Fed. R. Bankr. P. 9010(b), CKR Law LLP, as counsel to Bradshaw Westwood Trust, a landlord, creditor, and party in interest, in the jointly administered bankruptcy cases of Sears Holding Corporation, *et al.* (the “Debtors”), hereby enters its appearance and demands service of all notices and papers herein upon:

Bradshaw Westwood Trust  
c/o Gilbert R. Saydah Jr., Esq.  
CKR Law LLP  
1330 Avenue of the Americas, 14<sup>th</sup> Floor  
New York, NY 10019  
T: (212) 259-7300  
F: (212) 259-8200  
E: [gsaydah@ckrlaw.com](mailto:gsaydah@ckrlaw.com)

**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes all pleadings of any kind, including, without limitation, any notice, application, complaint, demand,

request, motion, order, and all exhibits to the foregoing, whether written or oral, formal or informal, however transmitted.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance and Demand for Service of Papers (the “Notice”) nor any later appearance or pleading shall constitute be deemed a submission to the jurisdiction of this Court or construed to be a waiver of:

- a) rights to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Judge;
- b) rights to trial by jury in any proceedings as to any and all matters so triable, whether or not the same be designated legal or private rights, or in any case, controversy or pursuant to 28 U.S.C. § 157(b)(2), and whether such jury trial right is pursuant to statute or the United States Constitution;
- c) rights to seek abstention or remand of any matter or proceeding subject to mandatory or discretionary abstention or remand, and to have the District Court withdraw the reference in any matter or proceeding subject to mandatory or discretionary withdrawal;
- d) rights to receipt of service of process in all actions, causes, claims, or proceedings arising in, arising under or related to these proceedings, including the right to contest service of process;
- e) any other rights, claims, actions, defenses, setoffs, or recoupments, to which Bradshaw Westwood Trust is or may be entitled, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments, Bradshaw Westwood Trust expressly reserves.

Dated: December 6, 2018  
New York, New York

**CKR LAW LLP**

/s/ Gilbert R. Saydah Jr.  
Gilbert R. Saydah Jr.  
1330 Avenue of the Americas, 14<sup>th</sup> Floor  
New York, NY 10019  
T: (212) 259-7300  
F: (212) 259-8200  
E: gsaydah@ckrlaw.com

*Counsel to Bradshaw Westwood Trust*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing instrument has been served on this 6th day of December, 2018 upon all parties requesting service via ECF notification.

/s/ Gilbert R. Saydah Jr.

Gilbert R. Saydah Jr.

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